U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION I
J.F.K. FEDERAL BUILDING, BOSTON, MA 02203-2211

MEMORANDUM

NAME: SYNTHETIC PROD
I.D. NO.: CTD001179688
FILE LOC: R-5
OTHER: PA+

DATE: September 18, 1992

SUBJ: Final PA-Plus Comments
Synthetic Products
Stratford, CT
CTD001179688

FROM: Anni Loughlin AL
Solid Waste & GIS Section

TO: File

Following are comments on the final Preliminary Assessment Plus report (PA-Plus). Errors occurred when changes made to the draft version were not consistently changed in other parts of the final report.

Page 14: The first paragraph should mention that Johnson Creek enters Long Island Sound via Lewis Gut and the Bridgeport Harbor.

Appendix A. - Areas of Concern Descriptions:

AOC #6: The location provided in the AOC Description is incorrect. The tank is located quite a bit south of the Roll Mill Area (AOC #4) according to the revised Figure 2.

cc: Ernest Waterman
ME, NH, & VT Waste Regulation Section

INTRODUCTION

The TRC Companies, Inc. Alternative Remedial Contract Strategy (ARCS/Region I) team was requested by the Region I U.S. Environmental Protection Agency (EPA) Waste Management Division to perform a Preliminary Assessment Plus (PA-PLUS) of the Synthetic Products site in Stratford, Connecticut. Tasks were conducted in accordance with the ARCS contract, the PA-PLUS Scope of Work and Technical Specification provided by the EPA under Work Assignment No. 10-1JZZ which was issued to ARCS/Region I on August 27, 1991. This PA-PLUS report was completed as part of EPA's Environmental Priorities Initiative (EPI), a joint project overseen by the Resource Conservation and Recovery Act (RCRA) program and the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) program, more commonly known as Superfund.

Background information used in the generation of this report was obtained through file searches conducted at the Connecticut Department of Environmental Protection (CTDEP) and EPA, telephone interviews with town officials and individuals knowledgeable of the property history and characteristics, and conversations with other Federal, State and local agencies. Information was also collected during the ARCS/Region I on-site reconnaissance which was conducted on May 7, 1992.

This package follows the guidelines developed under Superfund. However, these documents do not necessarily fulfill the requirements of other EPA regulations such as those under RCRA or other Federal, State or local regulations. The PA-PLUS provides a preliminary screening of facility operations. The EPI represents an integrated RCRA/CERCLA approach to assessing RCRA facilities utilizing procedures that combine elements of the Superfund Preliminary Assessment (PA) and the RCRA Facility Assessment (RFA). Under the EPI, current and former hazardous waste treatment, storage and disposal facilities regulated by the RCRA program are being evaluated to determine whether corrective action may be warranted. The PA-PLUS is a limited effort and is not intended to supersede more detailed investigations.

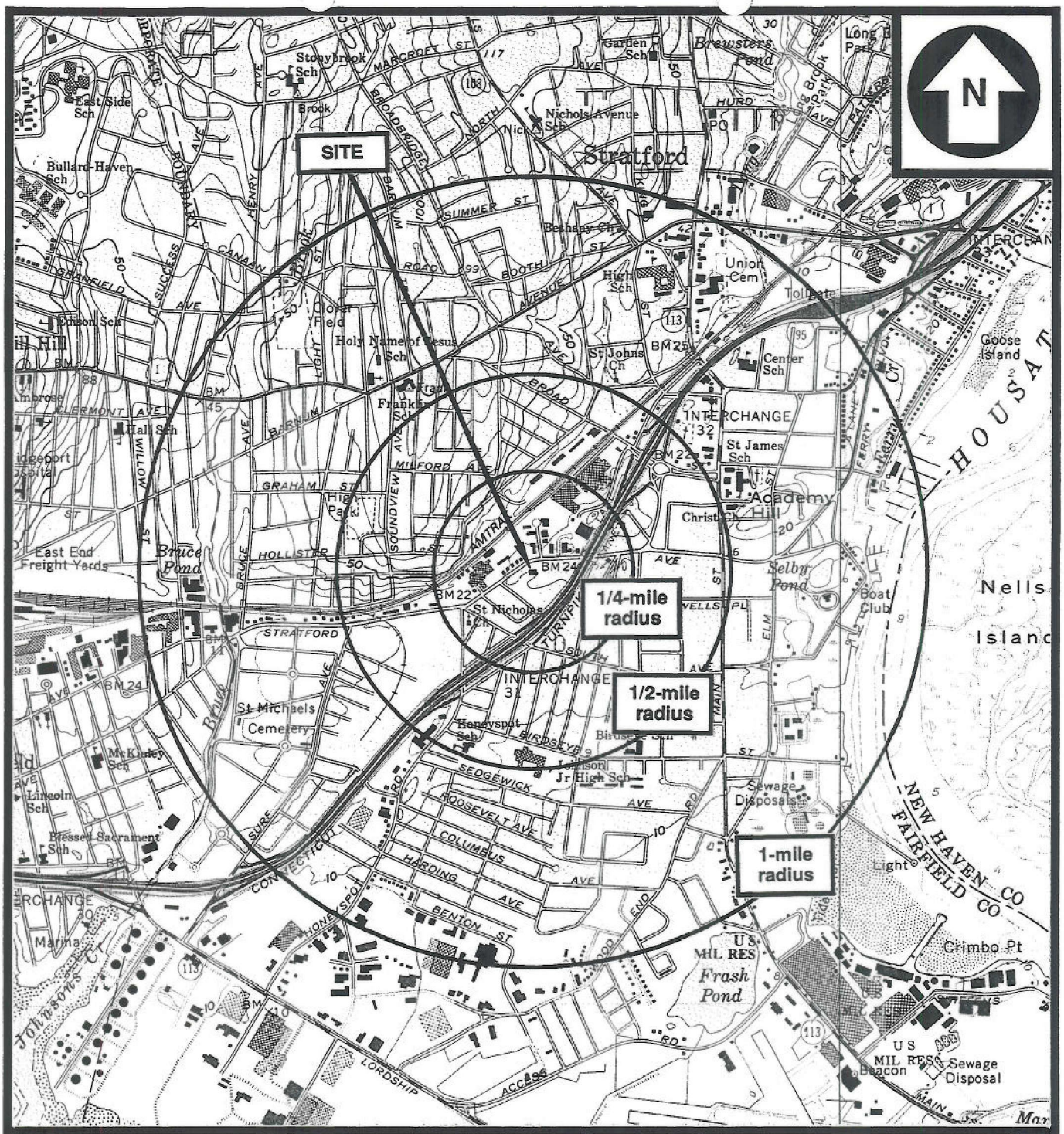
SITE DESCRIPTION

Synthetic Products Company (Synthetic) is located at 1525 Stratford Avenue, in Stratford, Connecticut (Figure 1). All operations and offices at Synthetic are housed in one building that is approximately 23,000 square feet (Figure 2). The facility occupies one acre of land at 73°08″27′ west longitude and 41°11″10′ north latitude (USGS 1984a). The area surrounding Synthetic is predominantly urban, and includes commercial and residential properties. It is bordered on the north by Stratford Avenue, on the south and west by private residences, and on the east by a commercial building supply business (Bankey, 1992a).

There is a four foot chain link fence along the south and west Synthetic property boundary, limiting access to the adjacent private residences. There are two vehicle entrances into the fenced area, one on the south side of the building, and the other on the northwest side of the building, near Stratford Avenue. There are no gates across either entrance. A truck loading dock and large garbage compactor, for non-hazardous wastes, are located within this fenced area on the west side of the building. The area in front of the loading dock and compactor are paved (Figure 2). A paved employee parking lot is located on the east side of the building. An empty barrel storage area is also located on the west side of the building, near the south end of the building (Bankey, 1992a).

SITE ACTIVITY/HISTORY

Synthetic is an active RCRA facility that has been in operation at its present location since 1972. Synthetic manufactures mixtures of chemicals (dispersions) which are used in processing plastics and rubber products. The raw materials used include lead oxide, cadmium, chrome, and zinc powders which are mixed with various oils, fillers, colorants, and accelerators (for elastomers) to form a thick paste or hard wax material. This material is then processed into its final form, and packaged (CTDEP, 1989, 1991).



BASE MAP IS A PORTION OF THE FOLLOWING 7.5' U.S.G.S. QUADRANGLES: MILFORD, CT, 1960, PHOTOREVISED 1984; BRIDGEPORT, CT, 1970, PHOTOREVISED 1984

0 1000 2000 3000 feet

QUADRANGLE LOCATION

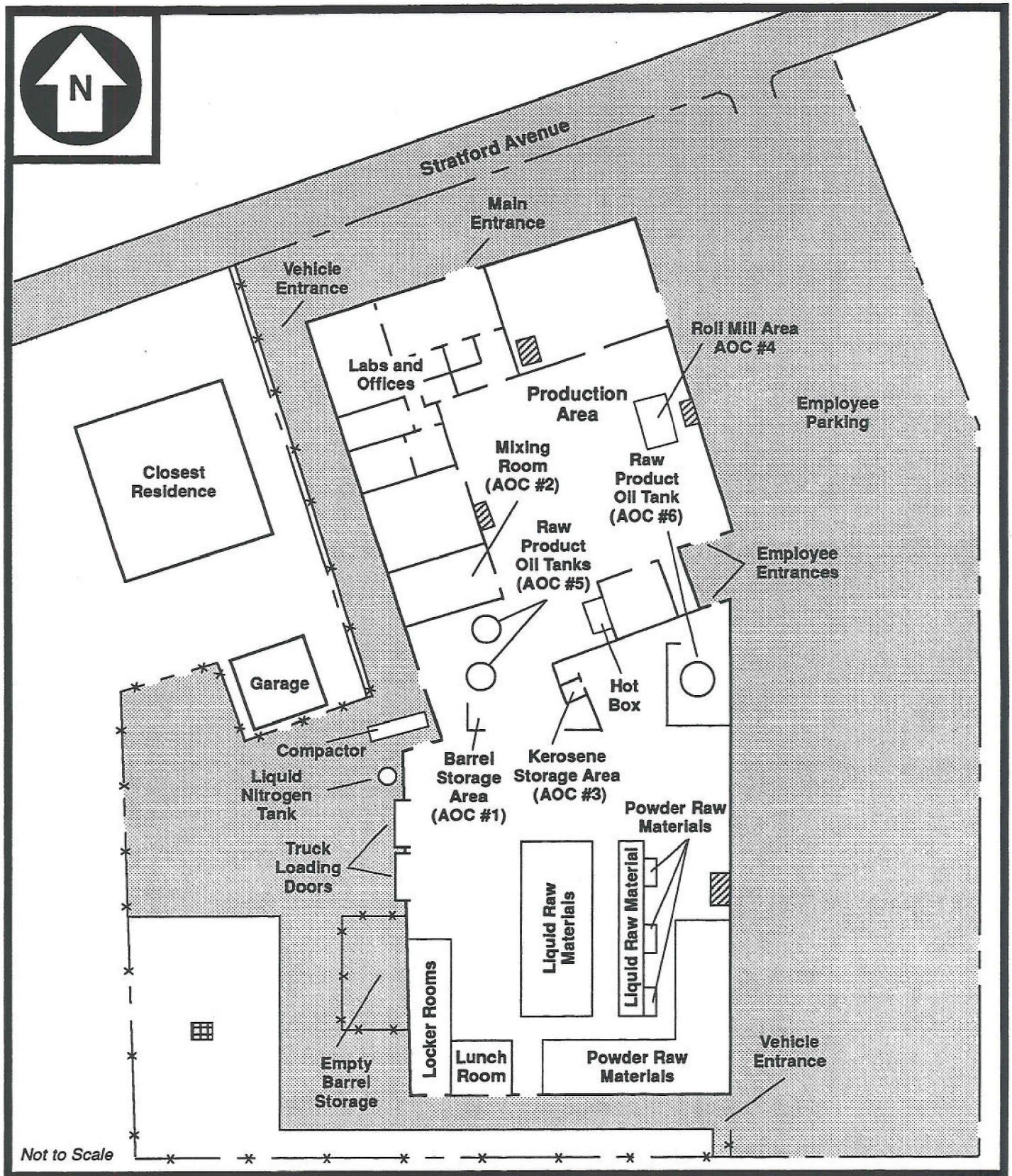
LOCATION MAP

SYNTHETIC PRODUCTS
STRATFORD, CONNECTICUT

TRC Companies, Inc.

Figure 1.

MS45/1/Q



SITE SKETCH

SYNTHETIC PRODUCTS
STRATFORD, CONNECTICUT

TRC Companies, Inc.

Figure 2.

A92-874/A

The raw material powders are in bags, stacked on wooden pallets, located in the center of the building near the east wall. Raw product oils are stored in two 1,000 gallon and one 2,000 gallon tank above ground storage tanks near the center of the building, and in drums in the southern end of the building, along with the remaining raw materials used in the manufacturing processes (Figure 2). Synthetic uses approximately 300 different types of oils in the manufacturing processes, for use at different times, depending on the product being produced (Bankey, 1992a).

Impure non-saleable products containing heavy metals (including lead) are discarded, as hazardous waste. These wastes are generated during equipment clean-ups, normal plant clean-ups (including floor spills), and dust collector material. All these wastes are in a solid form and stored in 55-gallon drums in the Barrel Storage Area (AOC #1), prior to offsite disposal (CTDEP, 1989, 1991).

The processes involved at this facility include (CTDEP, 1991):

1. Mixing - dry powders are mixed in one of three mixers where coloring agents (chromium and cadmium) and accelerants are added. Once mixed the material goes to the liquid mixing area where various light oils are added to form a viscous paste, or the material is mixed with various waxes to form a solid material.

2. Paste Formation - pastes are fed into one of two 2-roll mills or one of three 3-roll mills for further processing. From the mills the materials are either packaged in 5-gallon pails, or applied to rubber sheeting using a roller dispersion press, and packaged into plastic bags.

3. Wax Formation - the pastes designed for mixing with waxes are added to a steam-heated vat (hot box) (to 135 degrees Fahrenheit), mixed, poured off, allowed to harden, and packaged as a solid material.

All processing equipment at this facility are cleaned using kerosene applied to rags. After cleaning, the rags are taken to a wringer where the kerosene is pressed out into a collection drum. Sludges are allowed to settle, and are disposed of offsite as hazardous waste. The kerosene is reused, no waste kerosene is generated (CTDEP, 1991).

There are four dust collection units in operation at Synthetic; one dry cyclone type, that has a 55-gallon drum waste collection container attached, and three wet waterfall types. In these waterfall type units, the dust settles out as a sludge when the air is passed through the waterfall. The water is recirculated, and the sludge is periodically cleaned out and disposed of offsite (CTDEP, 1991).

The waste materials generated at Synthetic are temporarily stored in a barrel storage area located inside the building, prior to removal for offsite disposal. Areas of concern (AOC's) where hazardous wastes have come to be handled, are summarized in Table 1. Detailed descriptions of each AOC are included in Appendix A. Identification and description of AOC's are based on observations during the site reconnaissance and on available file material. Table 2 provides a summary of wastes handled and shipped offsite, for which documentation is available.

The property has been owned by Vivian Marsh since 1965, according to the Town of Stratford Assessor's Office (Bankey, 1992e). Synthetic has been leasing the property for its operations since 1972. Prior to Synthetic, the building was occupied by a machine shop that manufactured rivets and bolts (Bankey, 1992f). No further information on the machine shop, or use of this property prior to the machine shop, was available. The age of the houses around the facility appear to be greater than fifty years, and may have been built before the Synthetic facility building (Bankey, 1992a).

Synthetic initially applied for, and received, a hazardous waste permit as a generator and treatment, storage, and disposal facility (TSDF) in November 1980 (EPA, 1980b). Since the beginning of operations at this site, Synthetic has only been a generator of hazardous waste. It has not treated or disposed of hazardous waste onsite, or stored hazardous waste onsite longer than 90 days (Bankey, 1992a). In June 1984, Synthetic changed ownership and name from Dart Industries to its current name, and applied for a hazardous waste permit under the new name (EPA, 1984). In January 1989, Synthetic requested a status change from a Generator and TSDF to a Generator only, but was declined. CTDEP stated that a Closure Plan was needed before the facility could be considered for status change (CTDEP, 1989a). Synthetic is still classified as a TSDF according to the files reviewed. Table 3 presents a detailed chronological summary of regulatory activities relating to the Synthetic facility.

TABLE 1. AREA OF CONCERN (AOC) STATUS SUMMARY

Area of Concern (AOC)	AOC Description	Start-up Date/ Closure Date	Release Status	References
#1 Barrel Storage Area	Maximum 30 barrels of hazardous waste, mostly in solid form, stored in this AOC prior to offsite disposal.	1972 - present	Low potential of release.	Bankey, 1992a; CTDEP, 1989c
#2 Mixing Room	Room approximately 20'x30' where lead-based dry powders and binders are mixed.	1972 - present	Low potential of release.	Bankey, 1992a; CTDEP, 1989c
#3 Kerosene Storage Area	Open area in production area. One partially full barrel of kerosene used for equipment clean-up, and one partially full barrel of kerosene sludge stored in this AOC.	1972 - present	Low potential of release.	Bankey, 1992a; CTDEP, 1989c
#4 Roll Mill Area	Room approximately 30'x30' located near the center of the east side of the building. Elastomers are formed in this area by roll-milling the plastic products and adding dry powders containing heavy metals.	1972 - present	Low potential of release.	Bankey, 1992a; CTDEP, 1989c
#5 Raw Product Oil Tanks	Two 1,000 gallon above-ground storage tanks for product oils.	1972 - present	Low potential of release.	Bankey, 1992a; CTDEP, 1989c
#6 Raw Product Oil Tank	2,000 gallon above-ground storage tank for blending oils	1988 - present	Low potential of release	Bankey, 1992a; CTDEP, 1989c

Sources: CTDEP, 1991; Bankey, 1992a.

TABLE 2. HAZARDOUS WASTE QUANTITY

Substance	Quantity or Volume/Area	Years of Use/Storage	Years of Disposal	Source Area
Lead Contaminated Waste Material and Powders Containing Metals	144 drums in 1988 102 drums in 1989	1972 - present	NA	NA
Waste Oil and Hydraulic Fluids	1 drum in 1989	1972 - present	NA	NA
Kerosene Sludge	less than 1 drum per year	1972 - present	NA	NA

Source: CTDEP, 1991; Bankey, 1992f.

NA: Not Applicable

TABLE 3. REGULATORY ACTIVITIES AT SYNTHETIC PRODUCTS

Date	Activity
14 Nov 1980	Synthetic submitted an initial notification to EPA as a generator and TSDF (EPA, 1980a).
14 Nov 1980	Synthetic submitted a Part A Application to EPA for a hazardous waste permit as a Generator and TSD facility (EPA, 1980b).
02 June 1983	CTDEP conducted RCRA inspection of the facility noting several violations including: no waste analysis, closure/post closure, training, or contingency plans, no operating records, and no containment berm around waste drums (CTDEP, 1981).
22 June 1984	Synthetic informed the CTDEP of a change in ownership and corresponding name change (CTDEP, 1984).
22 June 1984	Synthetic applied for a hazardous waste permit under new name, no longer a Division of Dart Industries (formerly Ware Chemical)(EPA, 1984).
09 Feb 1986	A RCRA inspection of the site was conducted by Pete Zack and Jim Carr of the CTDEP. One violation was noted for storing approximately 60 drums in the drum storage area that has a capacity of 30 drums in the closure plan (CTDEP, 1986a).
12 Sept 1986	The President of Synthetic received a letter from the Director of the CTDEP Hazardous Material Management Unit (HWMU) informing him that Synthetic was in violation for failing to notify the CTDEP of a name change, and for deficiencies in financial assurance and liability insurance submittals (CTDEP, 1986b).
18 March 1987	Synthetic filed a 1986 Facility Hazardous Waste Annual Report with the CTDEP (CTDEP, 1987a).
12 Jan 1988	EPA requested RCRA information about solid waste management units at Synthetic (EPA, 1988a).
16 May 1988	Synthetic received a Letter from the Director of the CTDEP Hazardous Material Management Unit (HWMU) that informed them that interim status for a TSD facility was expiring unless a Part "B" Application was submitted on or before November 6, 1988 (CTDEP, 1988a).

TABLE 3. (CONTINUED)

Date	Activity
01 August 1988	Plastic Specialties and Technologies, Inc. transferred ownership to Synthetic Products, Co. (a division of Plastic Specialties and Technologies, Inc.). Pursuant to the transfer of ownership, the seller filed a Form 1, or Negative Declaration. In the Form 1, the seller stated that no release has occurred on-site (CTDEP, 1988b).
23 Nov 1988	EPA requested RCRA information from Synthetic on the closest drinking water supplies and a site sketch on a topographic map (EPA, 1988b).
06 Jan 1989	Synthetic requested CTDEP for status change from a TSDF to a Generator, and was declined. CTDEP stated that a Closure Plan was needed before the facility could be considered for status change (CTDEP, 1989a).
27 Feb 1989	1988 Hazardous Waste Facility Report for Synthetic was filed with the CTDEP (CTDEP, 1989b).
11 Sept 1989	A RCRA inspection of the site was conducted by D. Stokes and M. Guaenaccia of the CTDEP. Violations were noted regarding the need to analyze waste oil for EP Tox metals (CTDEP, 1989c).
04 June 1991	A RCRA inspection of the site was conducted by D. Chernauskas, R. Garbauskes, and M. Jepsen of CTDEP. No violations were noted (CTDEP, 1991

ENVIRONMENTAL SETTING

The 1.0 acre Synthetic Products site is located in an highly developed commercial and residential area. The property is relatively flat and has no noticeable paths of surface water runoff. The closest house to the facility is on the west, approximately 25-30 feet from the west side of the Synthetic building (Bankey, 1992a).

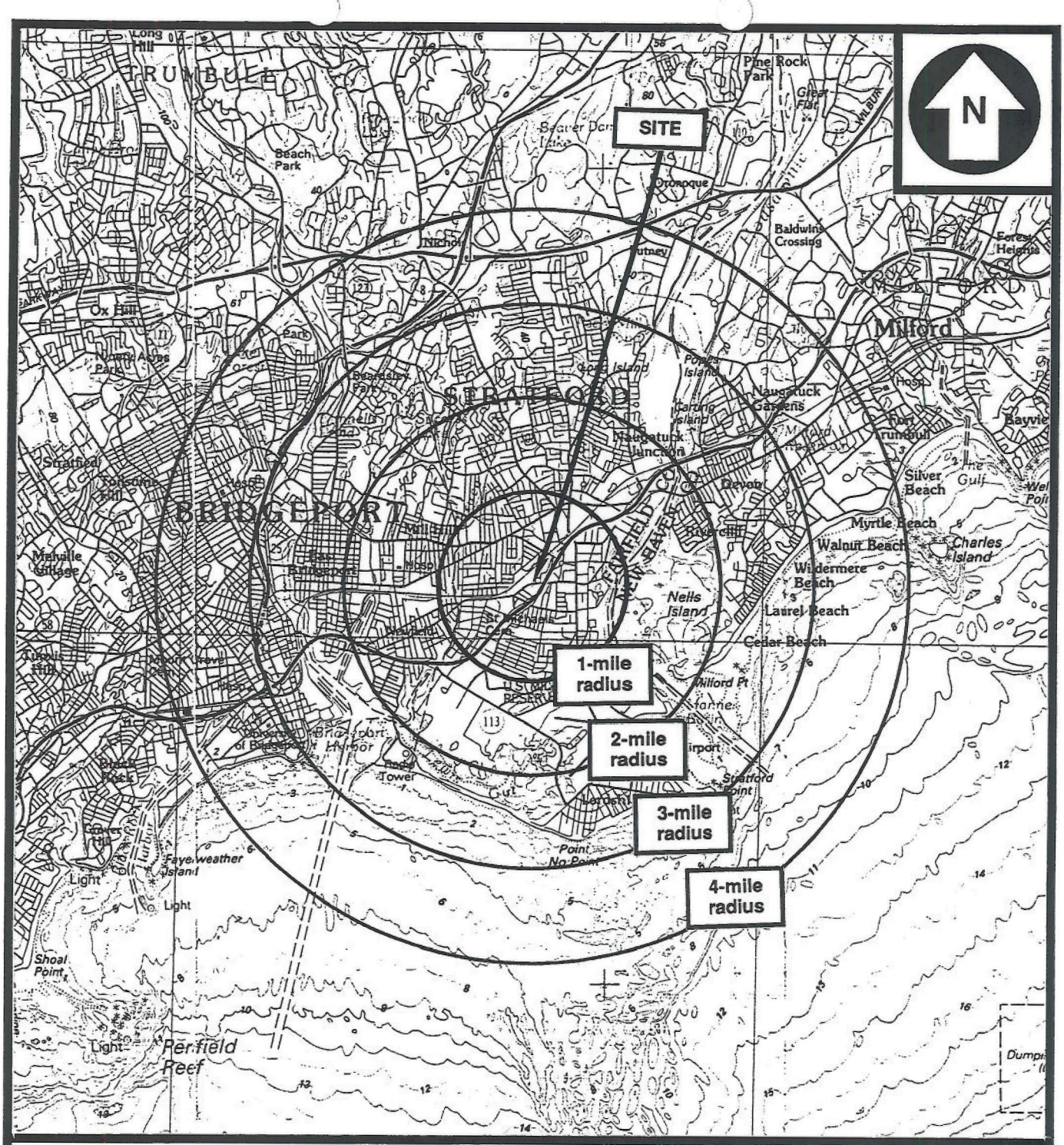
The subsurface stratigraphy underlying the site has not been characterized through a soil boring program. The soil classification of the site, according to the Soil Conservation Service is (Ur) Urban Land. This Urban land unit consists of areas where urban structures cover more than 85% of the surface, and slopes range from 0% to 8% but are dominantly less than 5% (February, 1981).

No information was found on site hydrology or ground water chemistry in the files reviewed. There are no ground water monitoring wells (MW's) on the property (Bankey, 1992a). The ground water flow direction and depth to ground water at the property are unknown.

Ground water in the area of the facility is classified as GB, as defined by the CTDEP. The GB class refers to ground water within highly urbanized areas of intense industrial activity, and where public water supply is available, ground water may not be suitable for direct human consumption without the need for treatment due to waste discharges, spills, leaks of chemicals, or land use impacts (CTDEP, 1987b).

Parts of the following Connecticut towns are within four miles of the Synthetic site (Figure 3): Stratford, Bridgeport, Milford, and Trumbull (Bankey, 1992b, EPA, 1992). Most of the residents within a four mile radius of the site rely upon drinking water obtained from public water supplies. The following percentages of populations in each town within a four mile radius of the site are supplied by public water; Bridgeport 99.99%, Stratford 90%, Milford 97.2%, adn Trumball 90% (EPA, 1992; Schmidl, 1992a).

There are no public water supply wells located within 4 miles of the Synthetic site (EPA, 1992). There are no designated areas of wellhead protection located within four miles of Synthetic (Nelson, 1991). The distance to the closest private water well is unknown. Due to the lack of positive location of the private wells, they have been assumed to be evenly distributed within each town. Private well use within four miles of the site is summarized in Table 4.



BASE MAP IS A PORTION OF THE FOLLOWING 30' x 60' U.S.G.S. QUADRANGLE: BRIDGEPORT, CT, 1986

0 5,000 10,000 15,000

scale in feet

FOUR-MILE RADIUS MAP

SYNTHETIC PRODUCTS
STRATFORD, CONNECTICUT

TRC Companies, Inc.

Figure 3.

TABLE 4. ESTIMATED PRIVATE WELL DISTRIBUTION WITHIN A FOUR MILE RADIUS OF SYNTHETIC PRODUCTS

Distance Ring (miles)	Town	Private Well Users	Total
0.00-0.25	Stratford	50	50
0.25-0.50	Stratford	149	149
0.50-1.00	Stratford	462	462
1.00-2.00	Stratford	1,242	
	Milford	9	1,251
2.00-3.00	Stratford	833	
	Milford	138	
	Bridgeport	1	972
3.00-4.00	Stratford	491	
	Milford	155	
	Bridgeport	1	
	Trumbull	522	1,169
TOTAL			**4,053**

(Bankey, 1992b, EPA, 1992, USGS, 1984a, 1984b, Schmidl, 1992a

There are no streams on or immediately adjacent to the Synthetic property. Surface runoff (from precipitation) from the Synthetic property discharges into a storm drain, located approximately 25-30 feet west of the southwest corner of the building, near the truck loading docks (Figure 2). This storm drain was installed within the last year. Prior to that, surface water runoff ponded in a low area near the truck loading docks (Bankey, 1992a). Surface water that enters this storm drain is mixed with water from hundreds of other storm drains in the Town of Stratford, on route to Johnson Creek, its discharge point and probable point of entry (PPE) (Bankey, 1992d).

The PPE for the surface water runoff, via the storm drain system, is approximately 1.3 miles southwest of the site, at the point of intersection of Johnson Creek with the Connecticut Turnpike on the Bridgeport, CT, 7.5 Minute Series Topographic Map (Bankey, 1992d, USGS, 1984a). Due to tidal influence, the remainder of the surface water pathway may be described as coastline of the Long Island Sound, extending approximately from Saugatuck, CT on the west, to within one mile of Woodmont, CT on the east. There are no drinking water intakes located along the surface water pathway (Schmidl, 1992). The Synthetic property is located in an area that has a greater than 500-year flood frequency (FEMA, 1991).

Johnson Creek, Bridgeport Harbor, and the Long Island Sound are classified by the CTDEP as SC/SB, and Lewis Gut is classified as SB (CTDEP, 1978b). A classification of SB describes water quality that is known or presumed to meet water quality standards, the classification of SC/SB is an indication of known pollution. The State's goal is to improve water quality to Class SB conditions.

The Johnson Creek and Long Island Sound are considered fisheries. Aquatic organisms found in these water bodies include eastern oysters, hard clams, soft-shell clams, striped bass, black sea bass, winter flounder, atlantic mackerel, bluefish, and tautog (F&WS, 1980).

The closest surface water body to the site is Selby Pond, located approximately 0.7 miles east of Synthetic (USGS, 1984a). Selby Pond is also the closest wetlands to the site (USDOI, 1980a). There are four areas of Connecticut State Protected Lands within four miles of the facility: 673 acre Charles E. Wheeler Wildlife Area, 1.1 miles east of the site; 10 acre Smith-Hubbel Wildlife Sanctuary, 2.2 miles east-southeast of the site; 24 acre Popes Island Wildlife Area, 2.7 miles northeast of the site; and 289 acre Silver Sands State Park, 3.5 miles east-northeast of the site (EPA, 1992).

A total of 0.9 miles of wetland frontage exists along the 15-mile surface pathway on Johnson Creek downstream from the PPE, to where it enters Bridgeport Harbor (Bankey, 1992c, USDOI, 1980a). The sensitive environment with the lowest flow rate would be wetlands approximately 0.2 miles from the PPE (1.5 miles from Synthetic) on Johnson Creek (USDOI,

1980a). In addition, Silver Sands State Park is located on Long Island Sound within the 15-mile downstream distance limit (Bankey, 1992c).

The least tern, a state-listed species, nests in wetlands located on Long Island Sound in Lewis Gut and in Stratford Point, which are both within the 15-mile distance limit (F&WS, 1980). Table 5 summarizes the locations of each identified sensitive environment and its distance from Synthetic, both radially and along the surface water pathway (where applicable).

Approximately 25 workers are employed at Synthetic, working two shifts (Bankey, 1992a). The closest residence to the property is approximately 25-30 feet of the west facility building, however, source areas and AOC's identified in this report are located inside the Synthetic building. There are no schools or day care centers located within 200 feet of areas of suspected contamination (Bankey, 1992a). Table 6 summarizes the population residing within four miles of Synthetic.

SUMMARY

The Synthetic site is located in southwestern Connecticut in the town of Stratford. All operations and offices at Synthetic are housed in one building that occupies one acre of land. Synthetic is an active RCRA facility that has been in operation at its present location since 1972. The plant manufactures lead based dispersions which are used in processing plastics and rubber products. Impure non-saleable products containing heavy metals, generated in the manufacturing process are classified as hazardous waste. These wastes are in a solid form, and are stored in 55-gallon drums prior to offsite disposal. No hazardous wastes are stored onsite for more than 90 days.

The Synthetic site is located in an urban commercial/residential area. Most of the population within 4 miles of the facility obtain drinking water from public water supply sources. Approximately 4,053 people within 4 miles of Synthetic rely on private wells for drinking water. Ground water beneath the property is designated as Class GB. Surface water from the Synthetic property flows into a storm drain which subsequently discharges into Johnson

TABLE 5. SENSITIVE ENVIRONMENTS WITHIN A FOUR MILE RADIUS OR 15 DOWNSTREAM MILES OF SYNTHETIC PRODUCTS

Sensitive Environment	Radial Distance from site	Distance Along Surface Water Pathways from PPE (miles)
Wetlands along Johnson Creek	NA	0.2 to 0.9
Charles E. Wheeler Wildlife Area	1.1 to 4.0	NA
Popes Island Wildlife Area	2.7 to 3.0	NA
Smith-Hubbel Wildlife Sanctuary	2.2 to 2.3	NA
Lewis Gut-Least Tern Nesting Site	NA	4.5
Stratford Point-Least Tern Nesting Site	NA	5.0
Silver Sands State Park	3.5 to 4.0	8.5

NA: Not applicable.
Sources: F&WS, 1980; Bankey, 1992c; EPA, 1992.

TABLE 6. ESTIMATED RESIDENTIAL POPULATION WITHIN FOUR MILES OF SYNTHETIC PRODUCTS

Distance Ring (miles)	Town	Population	Total
0.00-0.25	Stratford	503	503
0.25-0.50	Stratford	1,489	1,489
0.50-1.00	Stratford	4,621	
	Bridgeport	792	5,413
1.00-2.00	Stratford	12,416	
	Bridgeport	4,249	
	Milford	324	16,989
2.00-3.00	Stratford	8,326	
	Bridgeport	8,393	
	Milford	4,934	21,653
3.00-4.00	Stratford	4,911	
	Bridgeport	8,978	
	Milford	5,541	
	Trumbull	5,218	24,648
TOTAL			**70,695**

(Bankey, 1992b, EPA, 1992, USGS, 1984a, 1984b, Schmidl, 1992a

Creek, and thence to Long Island Sound, via Lewis Gut and the Bridgeport Harbor. No surface water intakes are located along the 15-mile downstream surface water pathway from the site.

At this time, EPA recommends that the Synthetic Products site be deferred to the RCRA program for further evaluation.

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CTDEP, 1989a. Letter from George Dews, HWMS, CTDEP, to James Kanlanta, Environmental Manager, Synthetic, January 6, 1989.

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APPENDIX A

AREAS OF CONCERN DESCRIPTIONS

The following are individual descriptions of the six AOCs identified in Table 1 including the AOC type, usage dates, release status, and references.

AOC Number - #1

AOC Name - Barrel Storage Area

AOC Status - Low potential of release.

AOC Description - The barrel storage area is for storage of hazardous wastes prior to offsite disposal. It has a maximum capacity of thirty 55-gallon drums according to the facility Closure Plan (HRP,1983), however, as many as sixty 55-gallon drums have been stored in this area (CTDEP, 1986a). The barrel storage area is located inside the building, near the truck loading docks, in the center of the west side of the building. Only minor stains were noted on the floor during the site reconnaissance (Bankey, 1992a).

AOC Start-up Date - 1972 (Bankey, 1992a).

AOC Closure Date - Currently in use (Bankey, 1992a).

Waste Managed at AOC - solid waste products containing heavy metals (lead oxide, cadmium, chromium, and zinc), kerosene waste sludge, and waste oil and hydraulic fluid (HRP, 1991, CTDEP, 1989a).

Release Controls - The concrete floor was chemically treated prior to drum storage in this AOC, and it located inside the building. The floor was noted as being in good condition on the site reconnaissance (Bankey, 1992a).

Release History - No information was found in the files reviewed indicating a release to the environment from this AOC.

AOC Number - #2

AOC Name - Mixing Room

AOC Status - Low potential of release.

AOC Description - The mixing room is where dry powders and binders are mixed, dry powders are mixed in one of three mixers where coloring agents (chromium and cadmium) and accelerants are added. Once mixed the material goes to the liquid mixing area where various light oils are added to form a viscous paste, or the material is mixed with various waxes to form a solid material. The mixing room is approximately 20'x30' and is located near the truck loading docks, on the west side of the building (Bankey, 1992a).

AOC Start-up Date - 1972 (Bankey, 1992a).

AOC Closure Date - Currently in use (Bankey, 1992a).

Waste Managed at AOC - Airborne dry powders containing the heavy metals lead oxide, cadmium, chromium, and zinc, and light oils (HRP, 1991, CTDEP, 1989a).

Release Controls - A dust collector hood is located over the metal mixing bowls to catch airborne dust released when the dry powders are added. This dust collector hood is connected up to the dust collection system (four dust collection units). The concrete floor was chemically treated prior to operations in this AOC, and it is located inside the building. On the site reconnaissance, the floor was noted as being in good condition with a few minor stains, (Bankey, 1992a).

Release History - No information was found in the files reviewed indicating a release to the environment from this AOC.

AOC Number - #3

AOC Name - Kerosene Storage Area

AOC Status - Low potential of release.

AOC Description - Kerosene is stored in a 55-gallon open-top barrel in an open area, located near the center of the building. After clean-up of the process equipment with kerosene soaked rags, the kerosene is returned to the drum for reuse by passing the rags through a wringer attached to the side of the barrel. The solid materials in the kerosene settle to the bottom of the drum and are removed about once every three months and put into the satellite accumulation drum. Numerous kerosene stains were noted on floor and wall around the kerosene barrels (Bankey, 1992a, CTDEP, 1989a).

AOC Start-up Date - 1972 (Bankey, 1992a).

AOC Closure Date - Currently in use (Bankey, 1992a).

Waste Managed at AOC - waste kerosene sludge and kerosene for reuse (CTDEP, 1989a).

Release Controls - The concrete floor was chemically treated prior to drum storage in this AOC, and is located inside the building. The floor was noted as being in good condition on the site reconnaissance. No odors were noted in the area (Bankey, 1992a).

Release History - No information was found in the files reviewed indicating a release to the environment from this AOC.

AOC Number - #4

AOC Name - Roll Mill Area

AOC Status - Low potential of release.

AOC Description - The roll mill area is where a 2 to 3-inch plastic product from the mixing process is milled down to a thickness of 3/8 to 1/4-inches. Dry powders are added to make elastomers. It is a room approximately 30'x30' located on the east side, near the center, of the building (Bankey, 1992a).

AOC Start-up Date - 1972 (1992a).

AOC Closure Date - Currently in use (Bankey, 1992a).

Waste Managed at AOC - Airborne dry powders containing the heavy metals lead oxide, cadmium, chromium, and zinc(CTDEP, 1989a).

Release Controls - A dust collector hood is located over the metal mixing bowls to catch airborne dust released when the dry powders are added. This dust collector hood is connected up to the dust collection system (four dust collection units). The concrete floor was chemically treated prior to operations in this AOC, and it is located inside the building. On the site reconnaissance, the floor was noted as being in good condition (Bankey, 1992a).

Release History - No information was found in the files reviewed indicating a release to the environment from this AOC.

AOC Number - #5

AOC Name - Raw Product Oil Tanks

AOC Status - Low potential of release.

AOC Description - The raw product oil tanks are 2-1000 gallon above-ground storage tanks located just north of the Barrel Storage Area (AOC #1), near the center of the west side of the building. This AOC is partially enclosed by a cement block wall, there is no direct access to outside the facility in case of a leak. Numerous oil stains were noted on the floor in front of the tanks (Bankey, 1992a).

AOC Start-up Date - 1972 (Bankey, 1992a).

AOC Closure Date - Currently in use (Bankey, 1992a).

Waste Managed at AOC - These tanks hold raw product oil used in the manufacturing process (Bankey, 1992a).

Release Controls - The tanks are on steel supports, approximately two feet above a concrete floor, inside the building (Bankey, 1992a).

Release History - No information was found in the files reviewed indicating a release to the environment from this AOC.

AOC Number - #6

AOC Name - Raw Product Oil Tank

AOC Status - Low potential of release.

AOC Description - The 2000 gallon above-ground storage tank is located just north of the Roll Mill Area (AOC #4), near the center of the east side of the building. No stains were noted on the flooring (Bankey, 1992a).

AOC Start-up Date - 1988 (Bankey, 1992a).

AOC Closure Date - Currently in use (Bankey, 1992a).

Waste Managed at AOC - Product oil, vinyl silane, a coupling agent used in the blending process is stored in this AOC (Bankey, 1992a).

Release Controls - This AOC is on steel supports approximately two feet above a concrete floor. The tank has a containment wall approximately 2.5 feet high around it (Bankey, 1992a).

Release History - No information was found in the files reviewed indicating a release to the environment from this AOC.